

MEMO ENDORSED

CILENTI & COOPER, PLLC

ATTORNEYS AT LAW
60 East 42nd Street - 40th Floor
New York, New York 10165

Telephone (212) 209-3933
Facsimile (212) 209-7102

May 22, 2024

By ECF

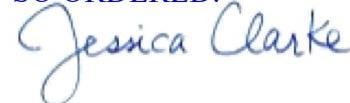
Honorable Jessica G. L. Clarke, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Dated: May 23, 2024

New York, New York

**MOTION FOR REFERRAL
TO MEDIATION**

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Re: *Miguel Angel Infante Santiago v. Belmont Realty LLC, et. al.*
Case No. 24 Civ. 2041 (JGLC)

Dear Judge Clarke,

We are counsel to plaintiff Miguel Angel Infante Santiago in this employment dispute / wage and hour action brought pursuant to the FLSA and New York Labor Law.

We write jointly to respectfully ask the court to adjourn the conference scheduled for June 21, 2024; and refer the parties to the SDNY mediation department for purposes of mediation to be completed within the next sixty (60) days.¹

We also respectfully ask the court to stay discovery and extend defendants' time to respond to the complaint until two (2) weeks following mediation and further order the parties to file a joint status report within sixty (60) days.

Thank you for your consideration of this case.

Respectfully submitted,

Peter H. Cooper

cc: Defense Counsel Sara David, Esq., (Via E-mail and ECF)

¹ The court's order [at Docket 5] instructs the parties to meet with the Magistrate Judge but we conferred and believe the mediation program would be a more efficient place to begin negotiations and we would prefer to save meeting with the Magistrate Judge until after we have begun the process, if necessary.